



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 15 2012

REPLY TO THE ATTENTION OF:

E-19J

Lynn Garrity
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

Re: Draft Environmental Impact Statement for the Trail Management Plan for Cuyhaoga Valley National Park, Brecksville, Ohio – CEQ # 20120196

Dear Ms. Garrity:

The United States Environmental Protection Agency has reviewed the above-referenced document provided by the National Park Service (NPS). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

Cuyahoga Valley National Park (Park) is a 33,000-acre park between the metropolitan areas of Cleveland and Akron, Ohio. Over 3 million people reside within 25 miles of the park. As a designated urban gateway park, the Park provides visitors the opportunity to experience the cultural, scenic, natural, historical, and recreational resources of the Cuyahoga River Valley and the Ohio and Erie Canal Corridor.

NPS is proposing to update their Trail Management Plan (Plan) to guide the expansion, restoration, management, operations, and use of the Park's trail system and its associated amenities over the next 15 years. The current Plan is outdated. Trails are no longer in desired configuration. Goals and objectives used to develop the updated Trail Management Plan are:

- Goal 1: A trail network that provides experiences for a variety of trail users.
- Goal 2: A trail network that shares the historic, scenic, natural, and recreational significance of the Park.
- Goal 3: A trail network that minimizes its footprint on the Park's historical, scenic, natural, and recreational resources.
- Goal 4: A trail network that can be sustained.
- Goal 5: Cooperative partnerships that contribute to the success of the Park trail network.

The Draft EIS states that the preferred alternative is Alternative #5 (ReUse, Recreation, and Destination), which includes an increase of 37 miles of trails from existing conditions, including 10 miles designated for mountain bikes, new and expanded parking facilities, new launch sites for water trail access, and expansion of hike-in and paddle-in campsites.

Based on our review of this document, EPA has assigned the Draft EIS a rating of “**Lack of Objections**” (LO). However, we note several measures we believe would further reduce impacts to human health and the environment over the term of the Plan and improve the quality of the document. These measures should be committed to in the Record of Decision (ROD). Please see the enclosed summary of the rating system used in the evaluation of the document.

Low-Impact Design

Alternative #5 includes approximately 7.45 acres of new or expanded parking lot area and new paddle launch sites and campsites. EPA recommends that all new or expanded facilities, including but not limited to parking lots, shelters, buildings, and roads, are constructed following low-impact design standards, including programs such as Leadership in Energy and Environmental Design (LEED), Energy Star appliances, EPA’s WaterSense Program, or other similar programs. New parking lots and other paved surfaces should use permeable or porous pavement technology to ensure increased stormwater infiltration and reduced runoff to adjacent waterbodies. EPA also recommends vegetated buffers and inlets around and in paved areas to further increase infiltration. Any such efforts should be outlined in the Final EIS. For additional information on green infrastructure, please visit: <http://water.epa.gov/infrastructure/greeninfrastructure/index.cfm>.

Aquatic Resources

Please be aware that the Cuyahoga River is an EPA-designated Great Lakes Area of Concern based on degraded fish populations, eutrophication, and heavily polluted sediments (restrictions on dredging). Therefore, any actions taken in the Cuyahoga River watershed should not exacerbate existing environmental issues, nor detract from remediation efforts as pursued by EPA or other governmental resource agencies. All mitigation measures detailed in this letter are intended to minimize potential impacts to the Cuyahoga River watershed.

The forthcoming wetland delineation (page 165 of the Draft EIS) should take place during the growing season, and not during drought conditions. Please include the delineation in the Final EIS and any jurisdictional determination correspondence from the U.S. Army Corps of Engineers.

Alternative #5 includes construction activity within the 100-year floodplain of the Cuyahoga River, within 25 to 125 feet of wetlands, and includes 84 new stream crossings. Some boardwalks are already included as part of this alternative. EPA strongly encourages boardwalk trail systems be pursued, as opposed to fill or culverting, at all stream crossings and in wetlands. Boardwalk crossings should span the channel of the stream and any boardwalk posts or fill should be kept above the ordinary high water mark of stream channels. Please note that trail design resulting in fill could be subject to Clean Water Act Section 404 permitting as well as the Clean Water Act

404(b)(1) Guidelines. Finally, EPA recommends a protected buffer of 50 feet around wetlands and streams; no new campsites, parking facilities, or other structures should be sited within 50 feet of wetlands or streams.

During construction of new trails or removal of existing trails, EPA encourages that work not be done in wetlands, including equipment staging. If any work needs to be done in or near wetlands or streams, EPA recommends the following measures to minimize impacts to aquatic resources:

- Construct during winter, if feasible.
- Minimize width of temporary access roads for construction access.
- Use easily-removed materials for construction of temporary access roads (e.g., swamp/timber mats) in lieu of materials that sink (e.g., stone, rip-rap, wood chips).
- Use swamp/timber mats or other alternative matting to distribute the weight of the construction equipment. This will minimize soil rutting and compaction.
- Use vehicles and construction equipment with wider-tired or rubberized tracks or use of low ground pressure equipment to further minimize impacts during construction access and staging.
- Use long-reach excavators, where appropriate, to avoid driving, traversing, or staging in wetlands.
- Place mats under construction equipment to contain any spills or leaks.

Diesel Emissions

Per the National Ambient Air Quality Standards for criteria pollutants, the Park is within counties or areas that are in non-attainment (8-hour ozone, annual $PM_{2.5}$, and 24-hour $PM_{2.5}$) and in maintenance (1-hour ozone, PM_{10} , and SO_2). Further, the National Institute for Occupational Safety and Health (NIOSH) has determined that diesel exhaust is a potential occupational carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. Acute exposures to diesel exhaust have been linked to health problems such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Based on this information, EPA recommends the following measures are implemented by NPS and its contractors to further reduced impacts to human health from diesel emissions during construction or removal of trails and other facilities.

- Use ultra low-sulfur diesel fuel.
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the exposure of personnel to concentrated fumes.
- Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Attach a hose to the tailpipe of diesel vehicles running indoors and exhaust the fumes outside, where they cannot reenter the workplace. Inspect hoses regularly for defects and damage.

- Use enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintain diesel engines, which is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Purchase new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids such as block heaters to warm the engine reduce diesel emissions.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.

In the Final EIS, please indicate whether recommended mitigation measures were included in the analysis. Again, any mitigation measures should be committed to in the ROD.

Thank you in advance for your consideration of our comments. If you have any questions, please contact Elizabeth Poole of my staff at (312) 353-2087 or poole.elizabeth@epa.gov.

Sincerely,

Kathleen Kowal

Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

for

Enclosure: Summary of Ratings Definitions

cc: Melissa Tarasiewicz, U.S. Army Corps of Engineers
Bill Zawiski, Ohio Environmental Protection Agency
Ed Wilk, Ohio Environmental Protection Agency